

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: KAREN MCDANIEL TODD,
DEBTOR(S)

DAVID RAWLINGS, TRUSTEE

CHAPTER 13 BANKRUPTCY
CASE NO. 20-50110-KMS

**TRUSTEE'S RESPONSE TO
MOTION TO SELL**

COMES NOW, the Chapter 13 Trustee, David Rawlings, by and through his attorney, and files this Response to the Debtor's Motion to Sell (Docket No. 61), and says that the Trustee has no objection to the sale price; Trustee has no objection to the Debtor receiving her full homestead exemption of \$75,000, however, Debtor's Schedule C only claimed \$44,646.00 as her homestead exemption; unless Schedule C is amended to claim the full homestead exemption, the Debtor may only receive \$44,646.00.

Respectfully submitted,

DAVID RAWLINGS, TRUSTEE

BY: /s/Samuel J. Duncan
Samuel J. Duncan,
His Attorney

Samuel J. Duncan
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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have on this day forwarded a true and correct copy of the foregoing Response, via the Court's ecf filing system, to: the US Trustee, 501 East Court Street, Suite 6-430, Jackson, Mississippi 39201; and TC Rollins Jr, PO Box 16767, Jackson, MS 39236.

So certified on this the 7th day of February, 2023.

/s/Samuel J. Duncan

Samuel J. Duncan